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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

OREADES SICAV represented by its Liquidator INTER INVESTISSEMENTS S.A., INTER INVESTISSEMENTS S.A. (f/k/a INTER CONSEIL S.A.), BNP PARIBAS INVESTMENT PARTNERS LUXEMBOURG S.A. (f/k/a BNP PARIBAS ASSET MANAGEMENT

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05120 (SMB)

LUXEMBOURG S.A., f/k/a PARVEST INVESTMENT MANAGEMENT COMPANY S.A.), BGL BNP PARIBAS S.A., and BNP PARIBAS SECURITIES SERVICES S.A.,

Defendant(s).

## STIPULATION ADJOURNING PRE-TRIAL CONFERENCE AND EXTENDING TIME TO RESPOND

WHEREAS, Plaintiff Irving H. Picard, Trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, individually, by and through his undersigned counsel, commenced this action by filing a Complaint on December 2, 2010; and

WHEREAS, on February 10, 2011, the defendants BNP Paribas Investment Partners Luxembourg S.A., BGL BNP Paribas S.A. and BNP Paribas Securities Services S.A. (together, the "BNPP Defendants"), by their undersigned counsel, agreed to waive service of the Summons and Complaint;

WHEREAS, on July 25, 2011, defendant Inter Investissements S.A. ("Inter Investissements"), by their undersigned counsel, accepted service of the Summons and Complaint, and waived any defenses based on insufficiency of service of process of the Summons and Complaint;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and the BNPP Defendants and defendant Inter Investissements S.A. (together, the "Defendants"), by their undersigned counsel, that the time by which the Defendants may move, answer or otherwise respond to the Complaint is extended up to and including July 16, 2014. This is the sixteenth such extension for the BNPP Defendants and fifteenth such extension for defendant Inter

Investissements. Nothing in this stipulation is a waiver of the Defendants' rights to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request. The pre-trial conference in the above-referenced adversary proceeding, which was previously scheduled for July 30, 2014, has been adjourned to September 17, 2014 at 10:00 a.m.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation, any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 5600) in the above-captioned case (No. 08-01789 (SMB)).

Dated: May 14, 2014

New York, New York

## BAKER & HOSTETLER LLP

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